

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

Direct Purchaser Cases

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) MDL Docket No. 2196
) Index No. 10-MD-2196 (JZ)
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**DEFENDANTS DOMFOAM INTERNATIONAL, INC. AND VALLE FOAM
INDUSTRIES (1995) INC.'S MOTION TO FILE UNDER SEAL**

Pursuant to Local Rule 5.2, Defendants Domfoam International, Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle Foam") respectfully move to file under seal their Motion and Memorandum of Law in Support of Motion to Dismiss Direct Purchaser Plaintiffs' Consolidated Amended Complaint ("Memorandum"), as well as Exhibit A to the Declaration of Shepard Goldfein ("Goldfein Declaration") filed in support of the Memorandum.

Exhibit A to the Goldfein Declaration contains excerpts from the Affidavit of Crecentia Zadik, a Special Agent with the Federal Bureau of Investigation, submitted to the United States

District Court for the Western District of North Carolina in support of a search warrant as part of an investigation by the Federal Bureau of Investigation and Antitrust Division of the United States Department of Justice ("Zadik Affidavit"). Although originally filed under seal, this document was briefly unsealed pursuant to Western District of North Carolina Local Criminal Rule 55.1(G) before being resealed (under which it remains at present).

As will be demonstrated in the Memorandum, many of Plaintiffs' allegations are taken directly from the Zadik Affidavit. However, certain allegations in that Affidavit, upon which we rely in our Memorandum, were not included in Direct Purchaser Plaintiffs' Consolidated Amended Complaint. Accordingly, the Memorandum incorporates certain portions of the Zadik Affidavit, and attaches as Exhibit A to the Goldfein Declaration those portions of the Zadik Affidavit. Thus, these documents contain information that is presently filed under seal in the Western District of North Carolina.

For these reasons, Defendants Domfoam and Valle Foam respectfully request that the Court issue an Order permitting the filing under seal of the Memorandum and Exhibit A to the Goldfein Declaration thereto.

DATED: April 12, 2011

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

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